

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

NATIONAL INSTITUTE OF FAMILY)	
AND LIFE ADVOCATES; WOMEN’S)	
HELP SERVICES D/B/A 1ST WAY LIFE)	
CENTER & FOCUS WOMEN’S CENTER;)	
ROCKFORD FAMILY INITIATIVE;)	
RELEVANT PREGNANCY OPTIONS)	
CENTER, and PRO-LIFE ACTION)	
LEAGUE, on behalf of themselves and their)	
clients,)	Case No.: 23-cv-50279
)	
Plaintiffs,)	
)	
v.)	
)	
KWAME RAOUL, in his official capacity)	
as Attorney General of the State of Illinois,)	
)	
Defendant.)	
)	

DECLARATION OF PETER BREEN, ESQ.

I, Peter Breen, declare as follows:

1. I am an attorney of record herein and competent to make this declaration.
2. Following each of the hearings and floor debates on Illinois Senate Bill 1909, I directed that requests for audio of those proceedings be made to the relevant sources of such information. In particular, I directed that requests be made of the House Clerk for audio of the House Health Care Availability & Accessibility Committee Hearing on SB 1909 and for audio of the House Floor Debate on SB 1909, and that requests be made of the Senate Clerk for audio of the Senate Floor Debate on SB 1909 and of BlueRoomStream (a recognized provider of video

and audio of various proceedings of the General Assembly) for the audio of the Senate Executive Committee Hearing on SB 1909.

3. After receipt of these audio files, I directed that true and accurate copies of the files be uploaded to a Google Drive, which is accessible at https://drive.google.com/drive/folders/18g8X5KQicAjQ47e1FYGu-vuyD-976tn2?usp=drive_link.

4. I also directed that the audio files be timely transcribed by a certified court reporter. The corresponding transcriptions are attached hereto as the following exhibits:

- Exhibit A: Senate Executive Committee Hearing, March, 29, 2023
- Exhibit B: Senate Floor Debate, March 31, 2023
- Exhibit C: House Health Care & Accessibility Committee Hearing, April 25, 2023
- Exhibit D: House Floor Debate, May 10, 2023

FURTHER DECLARANT SAYETH NAUGHT.

I, Peter Breen, declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Peter Breen", with a large, stylized initial "P".

Date: 07/11/2023